

235988

DEPT. OF TRANSPORTATION
DOCKETSTO: DEPARTMENT OF TRANSPORTATION
FEDERAL MOTOR CARRIER SAFETY ADMINISTRATION

2003 MAR 10 A 9:40

RE: COMMENTS
DOCKET NO. FMCSA-2002-12334 - 10
INQUIRIES REGARDING GRADUATED COMMERCIAL DRIVER'S LICENSE

1. Comments are offered by an employed driver commercially licensed since 1975. Driver has experience as a contracted truck owner, and in supervisory capacity in freight forwarding environment.
2. I do believe a graduated commercial driver's license is needed to better train and cull those who would present a hazard on public roads.
3. Issuance of a GCDL should be linked to completion of an accredited commercial driver-training program.
4. Curricula of all commercial driver-training programs should meet endorsed standards for both classroom and practical teaching.
5. A minimum of one (1) year experience in actual working environment without citation or at-fault accident should be required before issuance of unrestricted CDL.
6. An applicant's prior driving experience should be considered in issuing a GCDL. A minimum of two (2) years free of citation or at-fault accident should be required. Habits don't change with a license.
7. Two (2) years at-fault accident or citation free experience should be required in passenger vehicle before issuance of a GCDL. Minimum five (5) years for DUI/DWI, controlled substance, or reckless driving convictions. This would encourage responsible driving and growth of good habits in smaller vehicles.
8. Penalties for traffic convictions, regardless of license or vehicle type, should always be the same for all drivers.
9. Answered above, queries 6 and 7. This should include all pending actions, not just convictions posted to applicant's motor vehicle record.
10. Limitations on GCDL holders should be limited to cargo and equipment types. The purpose of a GCDL, to teach safe and responsible operation in working environment, would otherwise be impeded.
11. A fully licensed, and specially trained, driver should be required to be in a position to instruct at all times GCDL holder is in operation of commercial motor vehicle. This is to mean awake and alert for the period of six (6) months, and available in unit for completion of one (1) year period.
12. An applicant should be minimum of twenty-one (21) years of age to receive GCDL, meeting requirements set for in response seven (7) above.
13. Requirement in question twelve (12) would mandate unrestricted CDL issued at age twenty-two (22) if all other requirements are met.
14. A single comprehensive test would be sufficient to graduate to an unrestricted CDL after satisfactory completion all other requirements.
15. Training for fully licensed drivers to be trainers would required, as would a system to report abuses to protect all parties. Fully licensed trainers must also be able to report those they believe would

be a hazard without fear of recourse. Said students would be re-assigned to another trainer for re-evaluation minimum of twice before complete denial. Allegations of abuse against trainers would also need to be verified, and boundaries set before trainer status is revoked.

16. Minimal costs to companies training in a responsible manner at this time would be incurred. Companies currently using inadequately trained persons in team operations would incur greater costs. Companies currently utilizing and abusing inadequately trained persons to lower wage levels would incur greater costs.

Respectfully submitted,

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